



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 16, 2019

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Omar Amanat and Irfan Amanat
S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

The Government respectfully submits this letter on behalf of the parties to update the Court on the status of the Government's response to the defendants' discovery requests related to the obstruction of justice issues before the Court. The Government believes that it has substantially completed the production of discovery, consistent with the positions it set forth in the parties' September 16, 2019 letter — for example, the first and second categories in the September 16 letter.¹ The defendants continue to believe that they are entitled to additional documents and information whose relevance the Government disputes — for example, the third category in the September 16 letter. Accordingly, the parties respectfully request that the Court set a briefing schedule to resolve those discovery disputes. The parties propose the following schedule: the defendants' motions by November 8, 2019; the Government's opposition by November 26, 2019; and the defendants' replies, if any, by December 3, 2019.

MEMO ENDORSED

*Defendants' motion is due Nov. 15, 2019;
The Government's opposition is due Dec. 3,
2019; Defendants' replies are due
on Dec. 10, 2019.*

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By:

/s/

Andrea M. Griswold
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cc: Defense Counsel (via ECF) *Nov. 7, 2019*

¹ For example, as discussed with counsel for Irfan Amanat during a telephone call on October 15, 2019, the Government is still seeking to determine whether the CHS possesses certain additional text message communications on other mobile telephones that may be discoverable.